

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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INNOVATION VENTURES, LLC and LIVING
ESSENTIALS, LLC,

Plaintiffs,

12 Civ. 5354 (KAM)

-against-

ULTIMATE ONE DISTRIBUTING CORP.;
GULAN NAJIMI, a.k.a. GHULAMALI ALI
NAJIMI; WALLY NAJIMI, a.k.a. AHMED
WALLY NAJIMI; EXCEL WHOLESALE
DISTRIBUTORS, INC.; FARID
TURSONZADAH, a.k.a. FARID TURSON;
CORE-MARK INTERNATIONAL, INC.;
RICHMOND WHOLESALE COMPANY, INC.;
SAQUIB KHAN; CVS CAREMARK CORP.; 7-
ELEVEN, INC.; 7-ELEVEN STORE #11152; 7-
ELEVEN STORE #25449C-2422; 7-ELEVEN
STORE #11168F; 7-ELEVEN STORE #
11181; 7-ELEVEN STORE #32760; 7-ELEVEN
STORE #23407; PRESTIGE MOBIL; KAIVAL
DELI & CATERING; HEIGHTS DELI AND
COMPANY; VALERO RETAIL HOLDINGS,
INC.; NEW ISLAND DELI; NEVINS GOURMET;
DELTA DISTRIBUTION SERVICES CORP.;
SULAIMAN S. AAMIR; BROTHERS TRADING
CO., INC. D/B/A VICTORY WHOLESALE
GROCERS; QUALITY KING DISTRIBUTORS,
INC. ; BASELINE DISTRIBUTION, INC.; DAVID
FLOOD and john does 1-10,

**ANSWER OF DEFENDANTS
DELTA DISTRIBUTION
SERVICES CORP AND
SULAIMAN S. AAMIR TO
THE ~~FIRST~~ AMENDED
COMPLAINT**

Defendants.
-----x

Defendants, DELTA DISTRIBUTION SERVICES CORP. and
SULAIMAN S. AAMIR, by their attorney, JESS M. BERKOWITZ,
ESQ., answer the Plaintiffs' Complaint as follows:

1. Deny knowledge or information sufficient to
form a belief as to the truth of the allegations in
Paragraph "1" of the Complaint.

2. Deny knowledge or information sufficient to
form a belief as to the truth of the allegations in

Paragraph "2" of the Complaint.

3. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "3" of the Complaint.

4. Neither admit or deny the allegations in Paragraph "4" of the Complaint because they constitute statements of jurisdiction and conclusions of law to which no response is required. To the extent a response is required the Answering Defendants deny the allegations contained in this paragraph

5. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "5" of the Complaint.

6. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "6" of the Complaint.

7. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "7" of the Complaint.

8. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "8" of the Complaint.

9. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "9" of the Complaint.

10. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph "10" of the Complaint.

11. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "11" of the Complaint.

12. Neither admit or deny the allegations in Paragraph "12" of the Complaint because they constitute statements of jurisdiction and conclusions of law to which no response is required. To the extent a response is required the Answering Defendants deny the allegations contained in this paragraph.

13. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "13" of the Complaint.

14. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "14" of the Complaint.

15. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "15" of the Complaint.

16. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "16" of the Complaint.

17. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "17" of the Complaint.

18. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "18" of the Complaint.

19. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "19" of the Complaint.

20. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "20" of the Complaint.

21. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "21" of the Complaint.

22. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "22" of the Complaint.

23. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "23" of the Complaint.

24. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "24" of the Complaint.

25. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "25" of the Complaint.

26. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "26" of the Complaint.

27. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "27" of the Complaint.

28. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "28" of the Complaint.

29. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "29" of the Complaint.

30. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "30" of the Complaint.

31. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "31" of the Complaint.

32. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "32" of the Complaint.

33. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "33" of the Complaint.

34. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "34" of the Complaint.

35. Admits each and every allegation set forth in Paragraph "35" of the Complaint.

36. Denies each and every allegation contained in Paragraph "36" of the Complaint, except admits that the defendant SULAIMAN S. AAMIR is the sole shareholder,

officer and director of the defendant, DELTA DISTRIBUTION SERVICES CORP.

37. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "37" of the Complaint.

38. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "38" of the Complaint.

39. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "39" of the Complaint.

40. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "40" of the Complaint.

41. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "41" of the Complaint.

42. Neither admit or deny the allegations in Paragraph "42" of the Complaint because they constitute statements of jurisdiction and conclusions of law to which no response is required. To the extent a response is required the Answering Defendants deny the allegations contained in this paragraph.

43. Neither admit or deny the allegations in Paragraph "43" of the Complaint because they constitute statements of jurisdiction and conclusions of law to

which no response is required. To the extent a response is required the Answering Defendants deny the allegations contained in this paragraph.

44. Neither admit or deny the allegations in Paragraph "44" of the Complaint because they constitute statements of jurisdiction and conclusions of law to which no response is required. To the extent a response is required the Answering Defendants deny the allegations contained in this paragraph.

45. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "45" of the Complaint.

46. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "46" of the Complaint.

47. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "47" of the Complaint.

48. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "48" of the Complaint.

49. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "49", including subdivisions a, b, c, d, e, and f, of the Complaint.

50. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph "50" of the Complaint.

51. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "51" of the Complaint.

52. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "52" of the Complaint.

53. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "53" of the Complaint.

54. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "54" of the Complaint.

55. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "55" of the Complaint.

56. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "56" of the Complaint.

57. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "57" of the Complaint.

58. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "58" of the Complaint.

59. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in

Paragraph "59" of the Complaint.

60. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "60" of the Complaint.

61. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "61" of the Complaint.

62. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "62" of the Complaint.

63. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "63" of the Complaint.

64. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "64" of the Complaint.

65. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "65", and each and every subdivision thereof, of the Complaint.

66. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "66" of the Complaint.

67. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "67" of the Complaint.

68. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "68" of the Complaint.

69. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "69" of the Complaint.

70. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "70" of the Complaint.

71. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "71" of the Complaint.

72. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "72" of the Complaint.

73. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "73" of the Complaint.

74. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "74" of the Complaint.

75. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "75" of the Complaint.

76. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "76" of the Complaint.

77. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "77" of the Complaint.

78. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "78" of the Complaint.

79. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "79" of the Complaint.

80. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "80" of the Complaint.

81. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "81" of the Complaint.

82. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "82" of the Complaint.

83. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "83" of the Complaint.

84. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "84" of the Complaint.

85. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "85" of the Complaint.

86. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "86" of the Complaint.

87. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "87" of the Complaint.

88. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "88" of the Complaint.

89. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "89" of the Complaint.

90. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "90" of the Complaint.

91. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "91" of the Complaint.

92. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "92" of the Complaint.

93. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "93" of the Complaint.

94. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "94" of the Complaint.

95. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "95" of the Complaint.

96. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "96" of the Complaint.

97. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "97" of the Complaint.

98. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "98" of the Complaint.

99. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "99" of the Complaint.

100. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "100" of the Complaint.

101. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "101" of the Complaint.

102. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "102" of the Complaint.

103. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "103" of the Complaint.

104. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "104" of the Complaint.

105. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "105" of the Complaint.

106. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "106" of the Complaint.

107. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "107" of the Complaint.

108. Deny each and every allegation contained in Paragraph "108" of the Complaint.

109. Deny each and every allegation contained in Paragraph "109" of the Complaint, except admit that the Defendant, SULAIMAN S. AAMIR, is the sole shareholder, officer and director of the Defendant, DELTA DISTRIBUTION SERVICES CORP., a New York Corporation.

110. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "110" of the Complaint.

111. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "111" of the Complaint.

112. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "112" of the Complaint

113. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "113" of the Complaint.

114. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "114" of the Complaint.

**ANSWERING THE PLAINTIFFS'
FIRST CLAIM FOR RELIEF**

115. As to Paragraph 115 of the Plaintiffs' Complaint, the Answering Defendants repeat and reiterate each and every admission and denial, and incorporate same by reference, to Paragraphs 1 through 114 of said Complaint as if fully set forth herein.

116. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "116" of the Complaint.

117. Deny each and every allegation contained in Paragraph "117" of the Complaint.

118. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "118" of the Complaint.

119. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "119" of the Complaint.

120. Deny each and every allegation contained in Paragraph "120" of the Complaint.

**ANSWERING THE PLAINTIFFS'
SECOND CLAIM FOR RELIEF**

121. As to Paragraph 121 of the Plaintiffs' Complaint the Answering Defendants repeat and reiterate each and every admission and denial, and incorporate same by reference, in Paragraphs 1 through 114 of said Complaint as if fully set forth herein.

122. Deny each and every allegation contained in Paragraph "122" of the Complaint.

123. Deny each and every allegation contained in Paragraph "123" of the Complaint.

124. Deny each and every allegation contained in Paragraph "124" of the Complaint.

125. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "125" of the Complaint.

126. Deny each and every allegation contained in Paragraph "126" of the Complaint.

**ANSWERING THE PLAINTIFFS'
THIRD CLAIM FOR RELIEF**

127. As to Paragraph 127 of the Plaintiffs' Complaint the Answering Defendants repeat and reiterate each and every admission and denial, and incorporate same by reference, in Paragraphs 1 through 114 of said Complaint as if fully set forth herein.

128. Deny each and every allegation contained in Paragraph "128" of the Complaint.

129. Deny each and every allegation contained in Paragraph "129" of the Complaint.

~~130. Deny each and every allegation contained in Paragraph "129" of the Complaint.~~

130. Deny each and every allegation contained in Paragraph "130" of the Complaint.

131. Deny each and every allegation contained in Paragraph "131" of the Complaint.

132. Deny each and every allegation contained in Paragraph "132" of the Complaint.

133. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "133" of the Complaint.

134. Deny each and every allegation contained in Paragraph "134" of the Complaint.

**ANSWERING THE PLAINTIFFS'
FOURTH CLAIM FOR RELIEF**

135. As to Paragraph 135 of the Plaintiffs' Complaint the Answering Defendants repeat and reiterate each and every admission and denial, and incorporate same by reference, in Paragraphs 1 through 114 of said Complaint as if fully set forth herein.

136. Deny each and every allegation contained in Paragraph "136" of the Complaint.

137. Deny each and every allegation contained in Paragraph "137" of the Complaint.

138. Deny each and every allegation contained in Paragraph "138" of the Complaint.

139. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "139" of the Complaint.

140. Deny each and every allegation contained in Paragraph "140" of the Complaint.

**ANSWERING THE PLAINTIFFS'
FIFTH CLAIM FOR RELIEF**

141. As to Paragraph 141 of the Plaintiffs' Complaint the Answering Defendants repeat and reiterate each and every admission and denial, and incorporate same by reference, in Paragraphs 1 through 114 of said Complaint as if fully set forth herein.

142. Deny each and every allegation contained in Paragraph "142" of the Complaint.

143. Deny each and every allegation contained in Paragraph "143" of the Complaint.

144. Deny each and every allegation contained in Paragraph "144" of the Complaint.

145. Deny each and every allegation contained in Paragraph "145" of the Complaint.

146. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "146" of the Complaint.

147. Deny each and every allegation contained in Paragraph "147" of the Complaint.

**ANSWERING THE PLAINTIFFS'
SIXTH CLAIM FOR RELIEF**

148. As to Paragraph 148 of the Plaintiffs' Complaint the Answering Defendants repeat and reiterate each and every admission and denial, and incorporate same by reference, in Paragraphs 1 through 114 of said Complaint as if fully set forth herein.

149. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "149" of the Complaint.

150. Deny each and every allegation contained in Paragraph "150" of the Complaint.

151. Deny each and every allegation contained in Paragraph "151" of the Complaint.

152. Deny each and every allegation contained in Paragraph "152" of the Complaint.

153. Deny each and every allegation contained in Paragraph "153" of the Complaint.

154. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "154" of the Complaint.

155. Deny each and every allegation contained in Paragraph "155" of the Complaint.

**ANSWERING THE PLAINTIFFS'
SEVENTH CLAIM FOR RELIEF**

156. As to Paragraph 156 of the Plaintiffs' Complaint the Answering Defendants repeat and reiterate each and every

admission and denial, and incorporate same by reference, in Paragraphs 1 through 114 of said Complaint as if fully set forth herein.

157. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "157" of the Complaint.

158. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "158" of the Complaint.

159. Deny each and every allegation contained in Paragraph "159" of the Complaint.

160. Deny each and every allegation contained in Paragraph "160" of the Complaint.

161. Deny each and every allegation contained in Paragraph "161" of the Complaint.

162. Deny each and every allegation contained in Paragraph "162" of the Complaint.

163. Deny each and every allegation contained in Paragraph "163" of the Complaint.

164. Deny each and every allegation contained in Paragraph "164" of the Complaint.

**ANSWERING THE PLAINTIFFS'
EIGHTH CLAIM FOR RELIEF**

165. As to Paragraph 165 of the Plaintiffs' Complaint the Answering Defendants repeat and reiterate each and every admission and denial, and incorporate same by reference, in Paragraphs 1 through 114 of said Complaint as if fully set forth herein.

166. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "166" of the Complaint.

167. Deny each and every allegation contained in Paragraph "167" of the Complaint.

168. Deny each and every allegation contained in Paragraph "168" of the Complaint.

169. Deny each and every allegation contained in Paragraph "169" of the Complaint.

170. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "170" of the Complaint.

171. Deny each and every allegation contained in Paragraph "171" of the Complaint.

**ANSWERING THE PLAINTIFFS'
NINTH CLAIM FOR RELIEF**

172. As to Paragraph 172 of the Plaintiffs' Complaint the Answering Defendants repeat and reiterate each and every admission and denial, and incorporate same by reference, in Paragraphs 1 through 114 of said Complaint as if fully set forth herein.

173. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "173" of the Complaint.

174. Deny each and every allegation contained in Paragraph "174" of the Complaint.

175. Deny each and every allegation contained in Paragraph "175" of the Complaint.

176. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "176" of the Complaint.

177. Deny each and every allegation contained in Paragraph "175" of the Complaint.

**ANSWERING THE PLAINTIFFS'
TENTH CLAIM FOR RELIEF**

178. As to Paragraph 178 of the Plaintiffs' Complaint the Answering Defendants repeat and reiterate each and every admission and denial, and incorporate same by reference, in Paragraphs 1 through 114 of said Complaint as if fully set forth herein.

179. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "179" of the Complaint.

180. Deny each and every allegation contained in Paragraph "180" of the Complaint.

181. Deny knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph "181" of the Complaint.

182. Deny each and every allegation contained in Paragraph "182" of the Complaint.

**ANSWERING THE PLAINTIFFS'
ELEVENTH CLAIM FOR RELIEF**

183. As to Paragraph 183 of the Plaintiffs' Complaint the Answering Defendants repeat and reiterate each and every admission and denial, and incorporate same by reference, in Paragraphs 1 through 114 of said Complaint as if fully set forth herein.

184. Deny each and every allegation contained in Paragraph "184" of the Complaint.

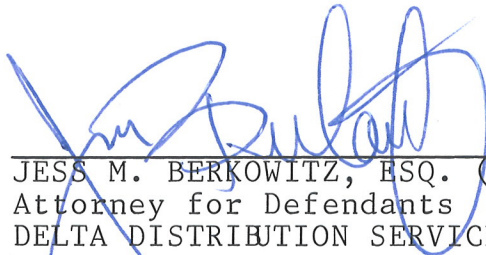
185. Deny each and every allegation contained in Paragraph "185" of the Complaint.

FIRST AFFIRMATIVE DEFENSE

186. The Complaint fails to state a claim against the Answering Defendants, DELTA DISTRIBUTION SERVICES CORP. and SULAIMAN S. AAMIR, upon which any of the relief sought can be granted.

WHEREFORE, THE Answering Defendants, DELTA DISTRIBUTION SERVICES CORP. and SULAIMAN S. AAMIR, demand judgment dismissing the Plaintiffs' Complaint, together with attorneys' fees, costs and disbursements.

Dated: New York, New York
November 15th, 2012



JESS M. BERKOWITZ, ESQ. (JSB3316)
Attorney for Defendants
DELTA DISTRIBUTION SERVICES CORP.
& SULAIMAN S. AAMIR
Office & P. O. Address
401 Broadway, Suite 1510
New York, New York 10013
(212)431-4453

CERTIFICATE OF SERVICE

I, JESS M. BERKOWITZ, ESQ., hereby certify that on November 16th, 2012, I caused a copy of the foregoing Answer of the Defendants, DELTA DISTRIBUTION SERVICES CORP. and SULAIMAN S. AAMIR, to be served by First Class Mail upon the following:

PATTERSON BELKNAP WEBB & TYLER LLP
Attorneys for Plaintiffs
1133 Avenue of the Americas
New York, New York 10036-6710

Dated: November 16th, 2012
New York, New York



JESS M. BERKOWITZ, ESQ. (JMB3316)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

INNOVATION VENTURES, LLC and LIVING
ESSENTIALS, LLC,

Plaintiffs,

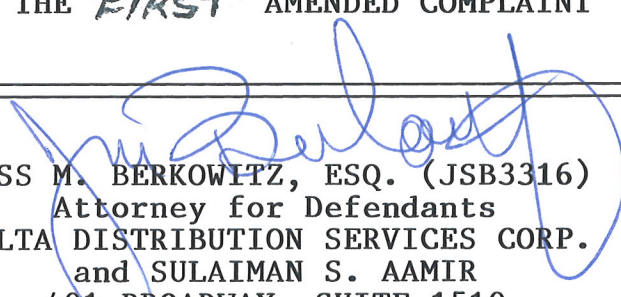
-against-

ULTIMATE ONE DISTRUTING CORP.;
gulam najimi, a.k.a. GHULAMALI ALI
NAJIMI; WALLY NAJIMI, a.k.a. AHMED
WALLY NAJIMI; ESCAL WHOLESALE
DISTRIBUTORS, INC.; FARID
TURSONZADAH, a.k.a. FARID TURSON;
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store #11168F-2422; 7-ELEVEN STORE #
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COMPANY; VALERO RETAIL HOLDINGS,
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GROCERS; QUALITY KING DISTRIBUTORS,
INC; BASELINE DISTRIBUTION, INC.; DAVID
FLOOD and JOHN DOES 1-10,

12 Civ. 5354 (KAM)

Defendants.

**ANSWER OF DEFENDANTS DELTA DISTRIBUTION
SERVICES CORP. AND SULAIMAN S. AAMIR
TO THE *FIRST* AMENDED COMPLAINT**


JESS M. BERKOWITZ, ESQ. (JSB3316)
Attorney for Defendants
DELTA DISTRIBUTION SERVICES CORP.
and SULAIMAN S. AAMIR
401 BROADWAY, SUITE 1510
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